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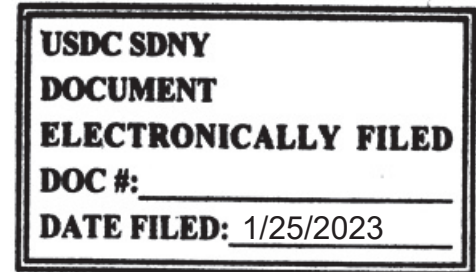
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January 25, 2023

VIA ECF

Hon. Robert W. Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Courtroom 18D
New York, NY 10007-1312



Re: Fagnani v. Ubiquiti Inc., Civil Action No.: 1:22-cv-10138-PGG-RWL

Dear Judge Lehrbrger:

This office represents Defendant Ubiquiti Inc. ("Defendant") in the above-referenced action. We write to respectfully request an extension of time for Defendant to respond to the Complaint, up to and including February 24, 2023.

By way of background, Plaintiff commenced this action on November 29, 2022. (ECF No. 1.) According to the affidavit of service, Defendant was purportedly served with the Summons and Complaint on December 23, 2022 by way of the New York Secretary of State, making Defendant's responsive pleading due on January 12, 2023.

Defendant has not responded to the Complaint by this purported deadline because it was not made aware of this action until January 23, 2023. Upon receiving actual notice, Defendant engaged counsel, and the undersigned's office promptly contacted counsel for Plaintiff, and secured consent for the requested extension of time. To this date, Defendant, through its registered agent, has not received a copy of the Summons and Complaint from the Office of the Secretary of State.

Defendant requires additional time to investigate the allegations in the Complaint. This is the first request for an extension of this deadline which, if granted, will not affect any other scheduled dates. This request is being made in good faith and, if granted, will not cause undue delay. This office has communicated with counsel for Plaintiff, and Plaintiff consents to this request.

We thank the Court in advance for its time and attention to this matter.



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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

cc: All counsel of record

Granted.

SO ORDERED:

1/25/2023

A handwritten signature in black ink, appearing to be 'R. Lehrburger', written over a horizontal line.

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE